

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN THE MATTER OF THE PETITION  
OF KAVANAGH FISHERIES, INC.  
OWNER OF THE F/V ATLANTIC  
FOR EXONERATION FROM OR  
LIMITATION OF LIABILITY

Civil Action No. 05-cv-10637-GAO

**ZIM'S LR 16.1 CERTIFICATION**

Attached is the Zim claimants' and counsel's signed certification.

RESPECTFULLY SUBMITTED this 16th day of May 2006.

DeORCHIS & PARTNERS, LLP  
Attorneys for  
Zim Integrated Shipping Services Ltd.  
Zim American Integrated Services, Inc.

/s/ David J. Farrell, Jr.  
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ZIM CLAIMANTS' LR 16.1 CERTIFICATION

Claimants Zim Integrated Shipping Services Ltd. and Zim American Integrated Services, Inc., by and through their undersigned authorized representative and counsel of record, affirm that we have conferred

(a) with a view to establishing a budget for the costs of conducting the full course – and various alternative courses – of the litigation; and

(b) to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in LR 16.4.

/s/ Brian S. Jones

Brian S. Jones

V.P. Claims & Insurance

for

Zim Integrated Shipping Services Ltd.

Zim American Integrated Services, Inc.

/s/ David J. Farrell, Jr.

David J. Farrell, Jr.

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